

**TALKIN, MUCCIGROSSO & ROBERTS, L.L.P.**

ATTORNEYS AT LAW  
40 EXCHANGE PLACE  
18TH FLOOR  
NEW YORK, NEW YORK 10005

(212) 482-0007 PHONE  
(212) 482-1303 FAX  
WWW.TALKINLAW.COM  
EMAIL: INFO@TALKINLAW.COM

MARYLAND OFFICE:  
5100 DORSEY HALL DRIVE  
SUITE 100  
ELLCOTT CITY, MD 21042  
410-964-0300

NEW JERSEY OFFICE:  
79 MAIN STREET  
SUITE ONE  
HACKENSACK, NJ 07601  
201-342-6665

October 6, 2020

Honorable Colleen McMahon  
Chief United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

BY ECF

Re: United States v. James Cahill  
20 Cr. 521 (CM)

Dear Judge McMahon:

Defendant James Cahill ("Cahill") is currently at liberty on a fully secured \$500,000 Appearance Bond that contains several conditions including home detention with permission to leave the home for both his and his wife's medical appointments and a restriction of travel to the Southern and Eastern Districts of New York. Cahill resides in Rockland County which is close to New Jersey. As a result, some of his and his wife's doctors are located in New Jersey. For this reason, Cahill respectfully requests that his bond be amended to permit travel to New Jersey for the purpose of attending his, or accompanying his wife on her, medical appointments upon advance permission from Pretrial Services. The government, by Assistant United States Attorney Jason Swergold, and Pretrial Services, by United States Pretrial Services Officer Winter Pascual, consent to this application.

Thank you for Your Honor's consideration of this request.

Very truly yours,

*Sanford Talkin*  
Sanford Talkin

cc: AUSA Jason Swergold (by ECF)  
USPTO Winter Pascual (by email)

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #:  
DATE FILED: 10/7/20